

PRIVACY POLICY

ENKIVERSE (PVT) LTD

Introduction

Our organization value and respects your privacy. Our organization is committed to protecting your information and data in accordance with the **Personal Data Protection Act, No. 9 of 2022** (the “Act”) and other related law(s) and regulation(s) in Sri Lanka. This Privacy Policy describes how we collect, use, and share the information we collect through our mobile application (the "App"). This Policy was last reviewed and updated on **03rd May 2023**.

Our organization

Enkiverse Pvt Ltd, the visionary company behind the Talk It Out app, is dedicated to revolutionizing the counseling landscape in Sri Lanka. With Talk It Out, individuals can effortlessly access our secure and confidential online counseling services. Our innovative mobile application allows users to download the app and connect with highly qualified counselors from the comfort and privacy of their own homes. At Enkiverse, we prioritize the well-being and personal growth of our users, providing a supportive platform for addressing various emotional and mental health challenges. We uphold the utmost standards of privacy and confidentiality, ensuring that all information and interactions within the Talk It Out app remain strictly protected. Our mission is to empower individuals on their journey towards improved mental health, self-discovery, and emotional well-being.

Information we collect.

The information we collect about you depends on the nature of your dealings with us or what you choose to share with us. The personal information we collect about you may include the following: -

- 1) **Personal Information:** We may collect personal information, such as your name, email address, phone number, date of birth, and payment information when you sign up for our counselling services.

- 2) **Personal Health Information:** We may collect health information, such as information about your mental health, medical conditions, medications, and treatment plans. We will only collect such information with your consent and to provide you with counselling services. **All such health information will be processed by a health professional (counsellor(s)) licensed under or authorized by any written law prevailing in Sri Lanka.**
- 3) **Technical Information:** We may collect technical information, such as your IP address, device type, operating system, and browser type when you use our App.

[Please refer the “schedule I” in the bottom to see information we collect in detailed manner.]

Method of collecting information

We collect your information directly from you when you interact with us over the phone, interact with us in person, interact with us online, participate in surveys or questionnaires, attend event(s), subscribe to our mailing list, document(s) provided by you and any other appropriate method(s).

Collecting information from third parties.

We may also collect your information from third parties or through publicly available sources, for an example we may collect your information from a family member. Further, our organization may collect your information from your counsellor.

How we use your information

We use the information we collect for following purposes: To provide services through app, to communicate with you about your treatment(s), and to improve our app and services offered by the app, to monitor your usage of the app. We may also use your information for the following purposes: To personalize your experience: We may use your information to

personalize your counselling sessions and to inform you with tailored treatment plans. To improve our services, we may use your information to improve our services and to develop new features for our App. To communicate with you, we may use your information to communicate with you about your treatment, to send you important updates, and to respond to your inquiries.

How we share your information

We may share your information with third-party service providers who help us provide our counselling services, such as our hosting and payment processing providers. We may also share your information with law enforcement agencies, regulatory bodies, or other third parties when required to comply with legal obligations or to protect our rights, property, or safety.

Cross-border data flow

Some of the third-party service providers we disclose personal information to may be based in or have servers located outside of Sri Lanka. Where we disclose your information to third parties overseas, we will take reasonable steps to ensure that data security and appropriate privacy practices are maintained. We will only disclose to overseas third parties if you have given us your consent to disclose information after having understand the possible risks. Further, we may process personal data (a) in a third country prescribed pursuant to an adequacy decision; or (b) in a country, not being a third country prescribed pursuant to an adequacy decision, only where such controller or processor as the case may be, ensures compliance with the respective obligations imposed under the Act.

Retention of information

We will not keep your information for longer than we need to. In most cases, this means that we will only retain your information for the duration of your relationship with us, unless we are required to retain your information for longer periods to comply with applicable laws, rules and regulations, for archiving purposes in the public interest, scientific research,

historical research or statistical purposes. The Criteria for determining such longer period(s) is as follows:

(add criteria)

Data protection officer

We may appoint a data protection officer(s) where applicable and such data protection officer(s) is a person who possess relevant academic and professional qualifications as may be prescribed which may include academic background, knowledge and technical skills in matters relating to data protection having competency and capacity to implement strategies and mechanisms to respond to inquiries and incidents related to processing of personal data. You may request to the contact the data protection officer when necessary and request must be sent to our email address.

Personal data protection impact assessment.

We may conduct from time to time “personal data protection impact assessment(s)” with regard to special categories of personal data such as the personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation, personal data relating to offences, criminal proceedings and convictions, or personal data relating to a child.

Security

We will take reasonable steps to ensure that the personal information that we hold about you is kept confidential and secure, including by: (1) having a robust physical security of our premises and databases / records; (2) taking measures to restrict access to only personnel who need that personal information to effectively provide services to you; (3) having technological measures in place (for example, anti-virus software, fire walls)

Even though we take reasonable steps to protect your information from unauthorized access, use, or disclosure no method of transmission over the internet or electronic storage is completely secure, and we cannot guarantee the absolute security of your information.

Your rights

You have the ultimate control over your information. You can choose not to provide us with certain information. However, this may limit your ability to use our app. You can also choose to delete your account and the information we have collected at any time of your choosing.

If you wish to make a request to access and / or to correct any information we hold about you, you shall make a written request to our email, and we will usually respond within 21 working days. You can also make a written request to our email to delete any or all your information which we hold. Further, you can make a complaint to the “Data Protection Authority of Sri Lanka” regarding any violations.

Refusal of requests

We may refuse to act on a request made by you to erase/delete your information in the event if we reasonably see that such information is relevant to the (a) the national security; (b) public order; (c) any inquiry conducted, investigation or procedure carried out under any written law; (d) the prevention, detection, investigation or prosecution of criminal offences; Grant or refusal of rectification, completion, erasure or refrain from further processing 10 Personal Data Protection Act, No. 9 of 2022 (e) the rights and freedoms of other persons under any written law; (f) subject to the provisions of subsection (4), the technical and operational feasibility of the controller to act on such request; (g) subject to the provisions of subsection (4), the inability of the controller to establish the identity of the data subject; or (h) the requirement to process personal data under any written law.

Inquiries, complaints and contacting

You can contact us when necessary, through our **email address:** hello@talkitoutapp.com
For inquiries and complaints about how we handles, processes or manages your personal information, please contact our representative through helpline: **Telephone:** **Email:** . Please note we may require proof of your identity and full details of your request before we can process your complaint.

Consent

By accepting the privacy policy, you will consent to the collection of above-mentioned data s using the data collection mechanisms that we have informed above. Such consent can be withdrawn anytime.

Changes to this privacy policy.

We may update this Privacy Policy from time to time. If we make material changes to this Privacy Policy, we will notify you by email or by posting a notice on our app.

SCHEDULE I above referred to	
Type of information	Intended purpose
Personal information	When creating user profile, accurate personal information is mandatory to keep the transparency between user roles (counsellor and patient). Subsequent administrative actions can be rolled out only if personal information is available readily in the application database.
Personal Health information	Application should adhere to provide professional service to the approved users. Hence health information is required to maintain the proper quality of the professional service.
Technical information	

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Note: All gathered information will be stored and hosted in internationally secured servers in a manner of encrypted. This will disable any third party to use, reproduce any of the data from the application database arbitrarily.